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15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA  
17 SAN FRANCISCO DIVISION

18 IN RE SEAGATE TECHNOLOGY LLC  
19 LITIGATION

No. 3:16-cv-00523-JCS

20 ADMINISTRATIVE MOTION TO FILE  
21 UNDER SEAL  
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1 Plaintiffs bring this administrative motion pursuant to Civil Local Rule 7-11 and 79-5, to file  
2 under seal the following documents:

- 3 1. Plaintiffs' Reply in Support of Motion for Class Certification ("Reply");
- 4 2. Exhibits 54 through 57 to the Declaration of Steve W. Berman in Further Support of
- 5 Plaintiffs' Motion for Class Certification ("Berman Declaration");
- 6 3. Declaration of Stefan Boedeker in Further Support of Plaintiffs' Motion for Class
- 7 Certification ("Boedeker Rebuttal Report"); and
- 8 4. Rebuttal Declaration of Andrew Hospodor in Support of Plaintiffs' Motion for Class
- 9 Certification ("Hospodor Rebuttal Report")

10 because they contain information designated by defendants as "Confidential," or " Highly  
11 Confidential – Attorneys' Eyes Only" under the Stipulated Protective Order ("Protective Order") in  
12 place in this action.<sup>1</sup> The Protective Order in this action requires that information designated as  
13 confidential "qualify for protection under Federal Rule of Civil Procedure 26(c)."<sup>2</sup> In turn, under  
14 Rule 26(c), a Court may require "that a trade secret or other confidential research, development, or  
15 commercial information not be revealed or be revealed only in a specified way."<sup>3</sup>

16 These cases involve the rights of thousands of consumers and businesses across the country –  
17 people and entities that should have the ability to see the issues being litigated in this case. The  
18 information contained in the Reply, Boedeker Rebuttal Report, Hospodor Rebuttal Report, and  
19 Exhibits 54 through 57 to the Berman Declaration are exactly the type of information that should be  
20 available for the public to review. Pursuant to the Protective Order and Civil Local Rule 79-5(d), the  
21 designating party must now demonstrate that the designated information is sealable or must  
22 withdraw the designation of confidentiality.

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27 <sup>1</sup> Stipulated Protective Order, July 8, 2016, ECF No. 61.

28 <sup>2</sup> *Id.*, ¶ 2.4.

<sup>3</sup> Fed. R. Civ. P. 26(c)(1)(G).

1 DATED: February 20, 2018

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